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Attorney for Defendant  
 H&R BLOCK TAX COMPANY

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CARYN PECORELLA, an individual,

Plaintiff,

vs.

H&R BLOCK TAX COMPANY, a foreign  
 Limited-Liability Company; HRB  
 RESOURCES LLC. A foreign Limited-  
 Liability Company; DOES 1-5 and ROES  
 1-5 inclusive.,

Defendants.

Case No.: 2:22-cv-01793-GMN-EJY

**STIPULATION AND [PROPOSED] ORDER  
 TO STAY CASE AND PROCEED TO  
 ARBITRATION**

Plaintiff, CARYN PECORELLA (“Plaintiff”), and Defendant HRB RESOURCES LLC (“Defendant”), by and through their respective counsel of record, do hereby stipulate and agree as follows:

WHEREAS, on or about December 1, 2021, Plaintiff entered into an agreement to arbitrate all disputes arising out of or relating to Plaintiff’s employment or termination of employment with Defendant (“Arbitration Agreement”);

WHEREAS, on or about December 26, 2022, Plaintiff filed a Complaint in the United States District Court against Defendant H&R BLOCK TAX COMPANY, District of Nevada, Case No. 2:22-cv-01793-GMN-EJY, alleging claims for breach of contract, bad faith discharge, tortious discharge, defamation, detrimental reliance, and retaliation in violation of Title VII of the Civil Rights Act of 1964;

WHEREAS, on January 24, 2023, Plaintiff filed an Amended Complaint to include HRB RESOURCES LLC as a Defendant in this lawsuit<sup>1</sup>;

WHEREAS, on January 26, 2023, Plaintiff filed a Second Amended Complaint;

WHEREAS, the claims alleged in Second Amended Complaint fall within the scope of the Arbitration Agreement;

THEREFORE, IT IS HEREBY STIPULATED by and between Plaintiff and Defendant and ORDERED as follows:

1. The instant action, in its entirety, shall be submitted to binding arbitration pursuant to the terms of the Arbitration Agreement;

2. Plaintiff reserves all claims and causes of action she has against Defendant, and nothing in this stipulation shall serve as a waiver of such claims and causes of action; and

3. All proceedings in the instant action shall be stayed and this Court shall retain jurisdiction over the action pending the conclusion of the arbitration.

Dated: January 27, 2023

Dated: January 27, 2023

Respectfully submitted,

Respectfully submitted,

/s/ Jordan M. Garcia

/s/ Emil S. Kim

Jordan M. Garcia, ESQ.  
NEVADA FAMILY LAW GROUP, LLC

EMIL S. KIM, ESQ.  
LITTLER MENDELSON, P.C.

Attorneys for Plaintiff  
CARYN PECORELLA

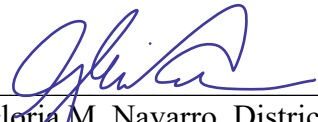
Attorneys for Defendant  
HRB RESOURCES, LLC

# **ORDER**

**IT IS SO ORDERED.**

**IT IS FURTHER ORDERED** that the parties shall file Joint Status Reports every ninety (90) days, informing the Court of the status of arbitration proceedings and the case as a whole, beginning on April 27, 2023.

Dated this 27 day of January, 2023.

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

<sup>1</sup> HRB Resources LLC was Plaintiff's actual and only employer and is therefore, the only properly-named Defendant.